



T. A. BLACKBURN LAW

TYRONE A. BLACKBURN

MEMBER OF
NY & NJ BAR

FEDERAL MEMBERSHIP
EDNY, SDNY, NDNY & DNJ

1242 East 80th Street, 3rd Floor
Brooklyn, New York 11236

January 21, 2022

VIA PACER

Honorable Eric N. Vitaliano
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Jennifer Hough v. Onika Tanya Maraj AKA ("Nicki Minaj") and
Kenneth Petty AKA ("Zoo"); Case No. 1:21-cv-04568-ENV-JRC**

Dear Judge Vitaliano:

We are counsel to Plaintiff Jennifer Hough in the above-referenced matter. I am writing in response to the Defense counsel's docket entry #54. On or about January 12, 2022, this writer informed Mr. Burstein that he has a scheduling conflict for February due to several pre-planned trips. This writer informed Mr. Burstein that the initial filing of his motion should be moved to March. Mr. Burstein agreed and suggested the following briefing schedule: March 4 for the motion, March 25 for the answer, and April 3 for the reply. (**Exhibit A**).

The dates offered by Mr. Burstein work with this writer's schedule. Unfortunately, this writer's co-counsel and former co-counsels may have conflicts with their schedules that have to be taken into consideration; however, Mr. Burstein has not been willing to sort through the scheduling conflicts collegially.

I want to bring to the court's attention the glaringly hypocritical claim by Mr. Burstein that the legitimate issues raised in docket entry #53 were outrageous. Throughout these proceedings, Mr. Burstein has taken residency in the sewers of the legal profession. He has behaved antithetical to the model rules of professional conduct. But this should come as no surprise since he has been on the receiving end of over ten sanction motions dating back to the early 1990s and as recent as 2018.

An example of his deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrounging through the comments section of youtube posts in search of comments



T. A. BLACKBURN LAW

posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession.

Finally, this proposed motion is nothing more than a billing exercise that serves no legitimate purpose. Due to the secondhand embarrassment Plaintiff feels from this misguided abuse of process, Plaintiff would like to apologize to the Court in advance for defendant wasting the Courts time.

Respectfully Submitted,

Tyrone A. Blackburn, Esq.
Tyrone A. Blackburn, Esq.



347-342-7432



tblackburn@tablackburnlaw.com



TABlackburnlaw.com